

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

CRYSTALLEX INTERNATIONAL CORP.,)	
)	
Plaintiff,)	
)	
v.)	Misc. No. 17-151-LPS
)	
BOLIVARIAN REPUBLIC OF VENEZUELA,)	
)	
Defendant.)	

**NOTICE OF SUBMISSION OF UNREDACTED COPIES OF THE SPECIAL
MASTER’S OPPOSITION TO PDVH AND CITGO’S OBJECTION TO THE SPECIAL
MASTER’S MATERIAL MODIFICATION OF THE SALE PROCEDURES ORDER
(D.I. 1317)**

PLEASE TAKE NOTICE THAT, that, pursuant to the Court’s *Oral Order*, dated September 26, 2024 (D.I. 1322), the Special Master attaches hereto as Exhibit 1 the previously sealed *Special Master’s Opposition to PDVH and CITGO’s Objection to the Special Master’s Material Modification of the Sale Procedures Order* (D.I. 1317) (the “**Opposition**”), including the accompanying draft stock purchase agreement attached thereto as Exhibit A (the “**April Draft SPA**”).

For the avoidance of doubt, nothing in the April Draft SPA shall be interpreted as indicative of the Special Master’s or any other party’s current or future position with respect to any terms of any proposed final stock purchase agreement. To reflect the preliminary nature of the April Draft SPA, a draft watermark has been added to the version of the exhibit attached hereto. The Opposition and the April Draft SPA are otherwise unchanged from the version filed under seal at D.I. 1317.

/s/ Robert B. Pincus

Robert B. Pincus
Special Master for the United States District Court
for the District of Delaware

October 3, 2024